

Timothy M. Bechtold  
BECHTOLD LAW FIRM, PLLC  
P.O. Box 7051  
Missoula, MT 59807  
406-721-1435  
tim@bechtoldlaw.net

Cameron Clevidence  
UPPER SEVEN LAW  
P.O. Box 31  
Helena, MT 59624  
406-270-1744  
cam@uppersevenlaw.com

*Attorneys for Plaintiff*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
HELENA DIVISION

STACY HALL,	)	CV 16-58-H-DLC
	)	
Plaintiff,	)	
	)	
	)	
v.	)	<b>MOTION FOR TRIAL</b>
	)	<b>SUBPOENAS</b>
	)	
	)	
BUDDY MYOTTE, et al.,	)	
	)	
Defendants.	)	
	)	
	)	

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Pursuant to this Court's prior orders, Plaintiff Stacy Hall respectfully moves for the Court to issue and serve trial subpoenas on the following persons:

- Defendant Buddy Myotte
  - Defendant Myotte was Sergeant of Locked Housing Unit Two at the Montana State Prison during all times relevant to this case.
- Defendant Alvin Fode
  - Defendant Fode was Unit Manager of Locked Housing Unit Two at the Montana State Prison during all times relevant to this case.
- Defendant Myron Beeson
  - Defendant Beeson was employed by the State of Montana as Associate Warden of Housing at the Montana State Prison during all times relevant to this case.
- Curtis Klatt
  - Mr. Klatt worked with Plaintiff as an inmate unit worker during all times relevant to this case.
- Jeremy Richard Ward

- Mr. Ward was employed on the Haz-Mat crew at the Montana State Prison during all times relevant to this case.
- James Bailey
  - Mr. Bailey was employed as a Correctional Officer at the Montana State Prison during all times relevant to this case. Mr. Bailey directly witnessed the conditions Plaintiff was subjected to while employed as an inmate unit worker.
- Paul Price
  - Mr. Price was employed as a Correctional Officer at the Montana State Prison during all times relevant to this case. Mr. Bailey directly witnessed the conditions Plaintiff was subjected to while employed as an inmate unit worker.

Dated March 20, 2023.

/s/Timothy M. Bechtold  
Timothy M. Bechtold  
BECHTOLD LAW FIRM

/s/ Cameron Clevidence  
Cameron Clevidence  
UPPER SEVEN LAW

*Attorneys for Plaintiff*